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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

NCR Docket No. 8808

Application of:

VINCENT, P. G.

Group Art Unit: 3623

Serial No. 09/729,540

Examiner: JEANTY, ROMAIN

Filed: December 4, 2000

For: SYSTEM AND METHODS FOR GRAPHICALLY REPRESENTING
PURCHASE PROFILES AND SALES GUIDANCE TO A CUSTOMER
SERVICE REPRESENTATIVE

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

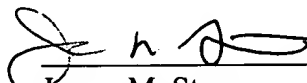
APPEAL BRIEF TRANSMITTAL LETTER

Sir:

Transmitted herewith for filing is an Appeal Brief to the Final Rejection dated
June 28, 2005.

- ☒ Please charge Deposit Account No. 14 0225 for the Appeal Brief fee or any other
fees associated with the filing of said Appeal Brief.
- ☒ Please charge any additional fees to the account of NCR Corporation, Deposit
Account No. 14 0225.

Respectfully submitted,


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CERTIFICATION OF MAILING UNDER 37 CFR 1.8

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Dayton, Ohio

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BRIEF ON APPEAL

Sir:

This is an appeal under 37 CFR 41.3 to the Board of Patent Appeals and Interferences of the United States Patent and Trademark Office from the final rejection of claims 1 through 21 of the above-identified patent application. The claims were finally rejected in an Office Action dated June 28, 2005.

CERTIFICATION OF MAILING UNDER 37 CFR 1.8

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By: Sallie Spicer
Name: Sallie Spicer

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(1) REAL PARTY IN INTEREST

The present application is assigned to NCR Corporation.

(2) RELATED APPEALS AND INTERFERENCES

There are currently no known active appeals or interferences related to the present application.

(3) STATUS OF CLAIMS

Claims 1 through 21 are pending in the application.

Claims 1 through 21 are all rejected and are being appealed. Such claims are shown in the Appendix attached to this Appeal Brief

(4) STATUS OF AMENDMENTS

A response to the Final Rejection dated June 28, 2005 has not been filed.

(5) SUMMARY OF CLAIMED SUBJECT MATTER

Claim 1

Independent claim 1 recites method of representing a customer's product purchasing profile to a customer service representative in an automated customer relationship management environment, said method comprising the steps of:

identifying a set of products for a sales campaign;

identifying one or more relationships between products within said set of products;

representing each product from within said set by a distinct image in a graphical display; and

visually distinguishing between said distinct product images in said graphical display based upon said identified product relationships.

Figure 1 of the present application illustrates a block diagram of a system for graphically representing customer purchase profiles. Figure 6 depicts a flow diagram of the processing steps followed by the system of Figure 1 in formatting and displaying a customer purchase profile. The steps of identifying a set of products for a sales campaign, and identifying one or more relationships between products within said set of products, recited in claim 1 are performed by data analysis tools 24 utilizing customer models 26 applied against a customer data store 22 as shown in Figure 1 and described at page 10, line 17 through page 11, line 23 of the present application.

The steps of representing each product from within said set by a distinct image in a graphical display, and visually distinguishing between said distinct product images in said graphical display based upon said identified product relationships are illustrated in steps 84, 86 and 94 of Figure 6 and described on page 19, lines 3 through 21 of the specification.

Claim 11

Independent claim 11 recites a method of graphically representing product purchase profiles and sales guidance to a customer service representative in an automated customer relationship management environment, said method comprising the steps of:

- identifying a customer, said customer being associated with one or more demographic attributes;

- accessing purchasing data for said customer from a data store, said purchasing data including products owned by said customer and products related by one or more criteria to said owned products;

determining a propensity of said customer to purchase each of said related products based upon one or more of said demographic attributes;
representing each of said owned and related products by a visual image;
mapping said product images into a graphical display; and
visually distinguishing between said product images in said display based upon said purchase propensity.

Figure 6 depicts a flow diagram illustrating a a method of graphically representing product purchase profiles and sales guidance to a customer service representative in an automated customer relationship management environment. The step of identifying a customer, said customer being associated with one or more demographic attributes is illustrated in step 80. The step of accessing purchasing data for said customer from a data store, said purchasing data including products owned by said customer and products related by one or more criteria to said owned products is illustrated in step 82. The step of determining a propensity of said customer to purchase each of said related products based upon one or more of said demographic attributes is performed by data analysis tools 24 utilizing customer models 26 applied against a customer data store 22 as shown in Figure 1 and described at page 10, line 17 through page 11, line 23 of the present application. The steps of representing each of said owned and related products by a visual image, mapping said product images into a graphical display, and visually distinguishing between said product images in said display based upon said purchase propensity is illustrated in step 84, 86, 88 and 94. The method steps illustrated in Figure 6 are described on page 18, line 13 through page 19, line 21 of the specification.

Claim 16

Independent claim 16 recites a computerized system for graphically representing a customer's product purchase profile and sales guidance to a customer service representative in an automated customer relationship management environment, said system comprising:

- a workstation display screen;
- a plurality of images on said display screen representing products owned by said customer and products related by one or more criteria to said owned products, said product images being mapped into a two-dimensional graphical display;
- an indicating device moveable between said product images on said display screen; and
- one or more distinct visual criteria in which to depict said product images in order to distinguish between said products.

A computerized system for graphically representing a customer's product purchase profile and sales guidance to a customer service representative in an automated customer relationship management environment is illustrated in Figure 1. Portions of the workstation display screen are illustrated in Figures 2 through 5. A plurality of images on said display screen representing products owned by said customer and products related by one or more criteria to said owned products, said product images being mapped into a two-dimensional graphical display, are shown in Figure 4 and described at page 16, line 13 through page 17, line 12 of the specification. An indicating device moveable between said product images on said display screen can be a mouse curser as shown in Figure 5 and described at page 17, lines 16 through 21. One or more distinct visual criteria in which to depict said product images in order to distinguish between said products is described at page 16, line 13 through page 17, line 14. As described with

referencece to Figure 4, visual criteria may comprise the use of color or the arrangemend of icons in rows and columns.

(6) GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Whether claims 1-7 and 9-21 were properly rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,966,695 issued to Melchione in view of U.S. Patent No. 6,370,513 issued to Kolawa et al.

Whether claim 8 was properly rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,966,695 issued to Melchione in view of U.S. Patent No. 6,370,513 issued to Kolawa et al., and further in view of U.S. Patent No. 6,331,858 issued to Fisher.

(7) ARGUMENT

Claim Rejections – Claims 1 through 10

Applicant respectfully traverses the rejection under 35 U.S.C. §103(a) of claims 1 through 10 of the present application.

The present application describes and claims a system and method for representing a customer's product purchasing profile to a customer service representative in an automated customer relationship management environment. The method includes the steps of identifying a set of products for a sales campaign, identifying one or more relationships between the products within the set of products, and representing each product from within the set by a distinct image in a graphical display. The product images are visually distinguished in the graphical display based upon the identified product relationships.

Claim 1 recites a method including the steps of identifying a set of products for a sales campaign; and identifying one or more relationships between products within said set of products.

Figure 1A of Melchione, and the related discussion at column 14, lines 33-36 of Melchione were cited as disclosing the steps of identifying a set of products for a sales campaign; and identifying one or more relationships between products within said set of products. Referring to Melchione, Figure 1A provides a diagram of the sales process described in column 14, lines 11 through 64, of Melchione, set forth below.

In accordance with an important aspect of the present invention, the system of the present invention is linked directly to on-line branch systems. In this way, leads, preferably loaded by the micromarketing center can be automatically sent to the branches. Regional micromarketing centers are particularly important to the system and process of the present invention. In particular, the present invention provides micromarketing centers with the ability to generate lists identifying various types of mailing addresses and providing a link to on-line CCIS branch systems. This gives the regional micromarketing center all the capabilities available in the analytical work station. Moreover, the micromarketing center can suppress various types of addresses, for example, business or legal addresses. The leads generated using this approach can be automatically uploaded overnight to a system for providing the leads directly to the branches.

In connection with the regional micromarketing center, the system of the present invention includes a graphical user interface that allows the regional micromarketing center to generate lists identifying various types of mailing addresses and linking to the on-line CCIS branch systems. This allows the original marketing center to direct leads to a specific campaign. In general, the sales process flow may be described as follows with reference to FIG. 1A.

Initially, branch users (bank management) decide on a sales promotion. The sales promotion concept is communicated to the regional micromarketing center. The system allows the regional micromarketing center to use the user work station to generate leads. Typically, a request can execute from 5 minutes to 24 hours depending on size and type of request. Leads are automatically loaded to a system (preferably a component of the CCIS) for providing leads to the branch users and personal bankers overnight. The personal bankers may then use the leads and relationship profiling (also a component of the CCIS) for sales calls.

The central customer information system ("CCIS") preferably includes a relationship profile component, an account management component, a lead management system, or a sales tracking and reporting (management information system or "MIS") component. Each component can generate reports, which are provided to the users (branch management) to complete the sales process.

The electronic sales and service support system is preferably capable of interfacing with a system for opening a single account that includes a full range of financial components. Thus, the integrated system of the present invention also preferably includes a system for opening an account, preferably in a single session. The system is preferably in communication with the central database, micromarketing centers, central customer information systems and branch systems of the present invention so that data can pass between these systems where legal and appropriate.

The above excerpt from Melchione describes a system for identifying or targeting customers and generating customer lists for use in a sales campaign. The targeted customers are also referred to a leads. Nowhere in the above excerpt, in Figure 1A, or in any other section of the reference cited in the Official Action, does the reference disclose the steps of identifying a set of products for a sales campaign; and identifying one or more relationships between products within said set of products.

It is accordingly believed that claim 1, as well as claims 2 through 10 which depend therefrom, each recite an invention which is patentable over the cited references to Melchione, Kolawa and Fisher, taken singularly or in combination.

Claim Rejections – Claims 11 through 21

Applicant respectfully traverses the rejection under 35 U.S.C. §103(a) of claims 11 through 21 of the present application.

Independent claim 11 recites a method of graphically representing product purchase profiles and sales guidance to a customer service representative in an

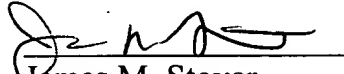
automated customer relationship management environment, said method including the step of accessing purchasing data for said customer from a data store, said purchasing data including products owned by said customer and products related by one or more criteria to said owned products. Independent claim 16, as amended, recites a system for graphically representing a customer's product purchase profile and sales guidance to a customer service representative in an automated customer relationship management environment, said system comprising a workstation display screen; and one or more images on said display screen representing products owned by said customer and products related by one or more criteria to said owned products.

It is not seen that any of the references cited in the Official Action teach or suggest a method including the limitation of accessing purchasing data for said customer from a data store, said purchasing data including products owned by a customer and products related by one or more criteria to said owned products, or a system including the limitation a plurality of more images on a display screen representing products owned by a customer and products related by one or more criteria to said owned products.

It is accordingly believed that claims 11 and 16 each recite an invention which is patentable over the cited references to Melchione, Kolawa and Fisher, taken singularly or in combination. Correspondingly, claims 12 through 15 which depend from claim 11, and claims 17 through 21 which depend from claim 16, are believed to be patentable over the cited references.

Review of the present application and claims with consideration of the foregoing comments, and reconsideration of the rejection of claims 1 through 12, are respectfully requested.

Respectfully submitted,


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(8) CLAIMS APPENDIX

1. (original) A method of representing a customer's product purchasing profile to a customer service representative in an automated customer relationship management environment, said method comprising the steps of:

identifying a set of products for a sales campaign;

identifying one or more relationships between products within said set of products;

representing each product from within said set by a distinct image in a graphical display; and

visually distinguishing between said distinct product images in said graphical display based upon said identified product relationships.

2. (original) The method of claim 1, wherein said step of identifying one or more relationships between said products includes distinguishing from within said product set, products owned by said customer.

3. (original) The method of claim 2, further comprising the steps of:

identifying one or more demographic factors associated with said customer;

determining a propensity of said customer to purchase each of one or more unowned products in said product set from said one or more demographic factors; and

using said determined purchase propensity to distinguish between said product images in said graphical display.

4. (original) The method of claim 3, further comprising the step of distinguishing between different levels of purchase propensity by different visual criteria.

5. (original) The method of claim 1, wherein said graphical display is an icon in a toolbar associated with a customer personalization software application.

6. (original) The method of claim 5, wherein selecting said toolbar icon displays a graphical representation of said product purchasing profile on a customer service representative's workstation screen.

7. (original) The method of claim 1 wherein said product images are visually distinguished by color.

8. (original) The method of claim 1, further comprising the step of mapping each of said product images into a two-dimensional graphical display according to one or more inter-product relationships.

9. (original) The method of claim 8, wherein said product images are arranged in a first dimension according to cross-sell potential and in a second dimension according to up-sell potential.

10. (original) The method of claim 1, further comprising the steps of:
selecting a product image from said graphical display; and
launching a sales script for said customer service representative corresponding to said selected product image.

11. (original) A method of graphically representing product purchase profiles and sales guidance to a customer service representative in an automated

customer relationship management environment, said method comprising the steps of:

- identifying a customer, said customer being associated with one or more demographic attributes;

- accessing purchasing data for said customer from a data store, said purchasing data including products owned by said customer and products related by one or more criteria to said owned products;

- determining a propensity of said customer to purchase each of said related products based upon one or more of said demographic attributes;

- representing each of said owned and related products by a visual image;

- mapping said product images into a graphical display; and

- visually distinguishing between said product images in said display based upon said purchase propensity.

12. (original) The method of claim 11, further comprising the steps of:

- selecting a product image from said graphical display; and

- launching a sales script for said customer service representative corresponding to said selected product image.

13. (original) The method of claim 11, wherein said step of visually distinguishing between said product images comprises identifying different product images by different colors.

14. (original) The method of claim 11, wherein said mapping step further comprises organizing each of said owned and related products in a two-dimensional graphical display according to inter-product relationships between the products.

15. (original) The method of claim 14, wherein said products are organized in a first dimension according to cross-sell potential and in a second dimension according to up-sell potential.

16. (previously presented) A computerized system for graphically representing a customer's product purchase profile and sales guidance to a customer service representative in an automated customer relationship management environment, said system comprising:

- a workstation display screen;

- a plurality of images on said display screen representing products owned by said customer and products related by one or more criteria to said owned products, said product images being mapped into a two-dimensional graphical display;

- an indicating device moveable between said product images on said display screen; and

- one or more distinct visual criteria in which to depict said product images in order to distinguish between said products.

17. (original) The system of claim 16, further comprising a personalization application comprising executable instructions for mapping said product images into said two-dimensional graphical display according to one or more inter-product relationships.

18. (original) The system of claim 16, wherein said product images are depicted by said one or more distinct visual criteria according to a propensity of said customer to purchase each of said products.

19. (original) The system of claim 17, wherein said personalization application maps said product images in a first dimension according to an up-sell relationship and in a second dimension according to a cross-sell relationship.

20. (original) The system of claim 17, wherein said personalization application generates one or more sales scripts for said customer service representative depending on a position of said indicating device on said product images.

21. (original) The system of claim 18, further comprising a builder service including executable instructions for associating a distinct visual criteria with each of one or more purchase propensity levels.

(9) EVIDENCE APPENDIX

Not applicable

(10) RELATED PROCEEDINGS APPENDIX

Not applicable